

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

NEW HAMPSHIRE INDONESIAN  
COMMUNITY SUPPORT, et al.,

*Plaintiffs,*

v.

DONALD J. TRUMP, President of the United  
States, in his official capacity, et al.,

*Defendants.*

Case No. 1:25-cv-38

**MOTION FOR THE ADMISSION, *PRO HAC VICE*, OF LEE GELERNT  
AS COUNSEL FOR PLAINTIFFS**

1. Pursuant to Rule 83.2(b) of the Local Rules of the United States District Court for the District of New Hampshire, New Hampshire Indonesian Community Support, League of United Latin American Citizens, and Make the Road New York (“Plaintiffs”) respectfully move this court for an order admitting Lee Gelernt to the bar of this Court, *pro hac vice*, for the purpose of representing Plaintiffs in the above-captioned case. Mr. Gelernt is knowledgeable regarding the dispute between the parties, and it would be economical and efficient to allow Mr. Gelernt to appear before this Court.

2. Mr. Gelernt is a member in good standing of the bars of New York, the U.S. Supreme Court, the U.S. District Court for the District of Columbia, the U.S. District Court for the Eastern District of Michigan, the U.S. District Court for the Eastern District of New York, the District of Columbia Court of Appeals, the U.S. Court of Appeals for the First Circuit, the U.S. Court of Appeals for the Second Circuit, the U.S. Court of Appeals for the Third Circuit, the U.S. Court of Appeals for the Fourth Circuit, the U.S. Court of Appeals for the Fifth Circuit, the U.S. Court of Appeals for the Sixth Circuit, the U.S. Court of Appeals for the Seventh Circuit, the U.S.

Court of Appeals for the Eighth Circuit, the U.S. Court of Appeals for the Ninth Circuit, the U.S. Court of Appeals for the Tenth Circuit, and the U.S. Court of Appeals for the Eleventh Circuit; he is not suspended or disbarred in any jurisdiction or involved in any disciplinary proceedings; and he has never had *pro hac vice* status denied or revoked by any court. An affidavit attesting to these facts is attached.

3. For the foregoing reasons, Plaintiffs respectfully request that this Court grant this motion and enter an order for admission of Mr. Gelernt *pro hac vice* in the above-captioned case.

4. **Certificate of Concurrence:** Pursuant to Local Rule 7.1(c), undersigned counsel for Plaintiffs certify that Plaintiffs have made a good faith attempt to obtain concurrence in the relief sought. Plaintiffs sought concurrence on the evening of January 20, 2025 and had not yet obtained assent by the time of filing on the same date.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

- A. Grant this Motion for Admission *Pro Hac Vice* of Lee Gelernt; and
- B. Grant such other and further relief as may be just and equitable.

Date: January 20, 2025

Respectfully submitted,

/s/ Gilles Bissonnette

Gilles R. Bissonnette (N.H. Bar No. 266657)

SangYeob Kim (N.H. Bar No. 266657)

Henry R. Klementowicz (N.H. Bar. No. 21177)

Chelsea Eddy (N.H. Bar No. 276248)

AMERICAN CIVIL LIBERTIES UNION OF NEW  
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*Counsel for Plaintiffs*

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**AFFIDAVIT OF LEE GELERNT**

I, Lee Gelernt, do hereby depose and swear as follows:

1. In accordance with Local Rule 83.2(b)(1)(A), I am an attorney at the American Civil Liberties Union Foundation, Inc. My office address is 125 Broad Street, 18th Floor, New York, NY 10004. My email address is lgelernt@aclu.org, and my telephone number is (212) 549-2616.

2. In accordance with LR 83.2(b)(1)(B), the following are the courts in which I am admitted to practice, along with the years and dates of my admission.

<u>Court</u>	<u>Date of Admission</u>	<u>Bar Number</u>
New York Court of Appeals	September 21, 1992	2502532
U.S. Supreme Court	April 16, 2001	
U.S. District Court, District of Columbia	June 7, 2021	NY0408
U.S. District Court, Eastern District of Michigan	March 26, 2002	
U.S. District Court, Eastern District of New York	July 8, 1993	
District of Columbia Court of Appeals	January 6, 2021	62840
First Circuit Court of Appeals	September 5, 1996	41744
Second Circuit Court of Appeals	September 29, 2006	
Third Circuit Court of Appeals	April 1, 1997	
Fourth Circuit Court of Appeals	July 23, 1998	
Fifth Circuit Court of Appeals	January 10, 2006	2502532
Sixth Circuit Court of Appeals	May 28, 1997	
Seventh Circuit Court of Appeals	June 19, 1998	
Eighth Circuit Court of Appeals	January 12, 1999	99-0024

Ninth Circuit Court of Appeals  
Tenth Circuit Court of Appeals  
Eleventh Circuit Court of Appeals

December 14, 2005  
June 17, 1998  
October 2, 1998

3. In accordance with LR 83.2(b)(1)(C), I am a member in good standing and eligible to practice in the above-listed courts.

4. In accordance with LR 83.2(b)(1)(D), I am not currently and have never been suspended or disbarred in any jurisdiction.

5. In accordance with LR 83.2(b)(1)(E)(1), I have not been denied admission to practice before any court.

6. In accordance with LR 83.2(b)(1)(E)(2), I have not previously been disciplined by any court, nor am I subject to any pending disciplinary matters.

7. In accordance with LR 83.2(b)(1)(E)(3), I have not been convicted of any felony or misdemeanor crimes.

8. In accordance with LR 83.2(b)(1)(F), I have not been denied admission to practice before any court, and no court has denied or revoked my pro hac vice status.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: January 20, 2025

Respectfully submitted,

/s/ Lee Gelernt

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